

A call for information – Welsh Government draft budget proposals for 2017-18

13TH SEPTEMBER 2016

ANNEX 2 -CONSULTATION QUESTIONS

SUMMARY

WWF Cymru believes it is crucial that the Programme for Government and budget demonstrate Welsh Government's determination to drive through the major changes required by the Wellbeing of Future Generations and Environment Acts.

The budget should be signalling the key changes in approach legally required. For example:

- Addressing long term problems and shifting expenditure to prevention of these problems
- Expenditure should clearly reflect key programmes essential to achieving each goal
- Evidence of integration of action across departments (and organisations) to deliver the goals, reflected in pooled budgets
- Resources, particularly in the business and enterprise portfolio, shifting to prioritising the protection of natural resources for future generations and tackling climate change.

This budget must therefore be the start of the transformational change that a sustainable Wales requires. We don't expect this budget to demonstrate all of our expectations on the delivery of the WFGA but this budget must not be business as usual and should be supported at the very least by a narrative that explains the change process and the overall vision to which it strives.

It is worth noting that assessment on natural capital and climate is not unique to Wales e.g. Natural Capital Committee provides independent advice at UK Government level. We can therefore work with other organisations to develop processes in this complex area.

2. What expectations do you have of the 2017-18 draft budget proposals?

As members of the Sustainable Development Alliance, WWF Cymru expects to see the Welsh Government budget reflect the goals and principles embedded in Welsh law by the Wellbeing of Future Generations Act. The Act requires all Welsh public bodies, including the Welsh Government, to act in accordance with the sustainable development principle. Given that the budget underpins the actions that Welsh Government will take in the next twelve months it is clear that the budget must work in accord with the principles. In general terms this means we would expect to see:

- A clear shift in expenditure towards programmes aimed at preventing problems occurring
- Financial arrangements, such as pooled budgets, that encourage and require collaboration amongst public bodies and facilitate the achievement of multiple goals
- An emphasis on addressing long term problems (such as climate change and the decline of biodiversity)

This will be the first budget to be delivered since the Wellbeing of Future Generations Act (WFGA) came into force. The requirements of the WFGA change the financial landscape for Government as well as 43 other public bodies: Welsh Government are now expected to publish a statement on their wellbeing objectives which also explains how resources are being allocated to meet the those objectives.

It is unclear whether Welsh Government intends the Programme to be its Wellbeing Objectives and whether this will be done alongside the budget. This makes assessment of Welsh Government's fulfilment of its duties hard to predict. WWF Cymru believes transparency is necessary for the proper application of the principle of stakeholder engagement. Stakeholders, such as SD Alliance members must be able to understand and analyse the Government proposals in order to contribute effectively to decision making. Currently we feel there is little transparency.

We would expect to see evidence in the budget and Programme for Government, that:

- A. Government are resourcing key programmes of delivery under *each* goal
 - B. Resources are beginning to shift towards *maximising* the delivery of all seven goals in the WFGA. (i.e. Some integration and pooling of resources)
 - C. Evidence that the SD principles have been applied to decision-making
 - D. Evidence that protection of natural resources for future generations is being given more priority
- A. Government are resourcing key programmes of delivery under *each* goal.**

Subject committees are perhaps best placed to enquire into the detail of changes in budgets and their efficacy in delivering individual goals. For example, the Prosperous Wales goal aims for a low carbon economy, recognising environmental limits, using resources more efficiently and proportionately. This is a considerable change to the previous focus of Government economic development strategy, which should be reflected in a shift in the focus of the spending on economic development and infrastructure. Not only would we expect investment which will leverage private sector investment in these areas but also the removal of environmentally harmful support or subsidies which will not encourage the transition to such a low carbon economy and may counteract progress towards tackling climate change. This will be a challenge for the Enterprise and Business committee and it may require input from CCERA to assist in assessing progress on such a complex goal. Such cross – committee expertise is likely to be required for effective scrutiny of implementation.

B. Maximising the contribution to all the goals

It would seem more difficult for any single committee, except perhaps the Finance Committee, to take an overview of whether the budget is being applied as best it can be to *maximise* contribution to the goals.

However, initial scrutiny could focus on investment in major cornerstone programmes which can contribute significantly to several goals. We consider increased investment in energy efficiency retrofit for houses in Wales - would be such a programme.

C. Evidence that the SD principle has been applied to decision-making

WWF Cymru believes it is important that the following key aspects of the principle are addressed in the budget statement.

- Balancing short term needs with safeguarding the ability of future generations to meet their own needs;

The National Audit Office (NAO) in England has highlighted how longer-term budgetary planning leads to better outcomes, reduced public spending, and greater value for money. It creates the conditions for promoting ‘spend to save’ investment in, for example, preventative and restorative action, the benefits of which may only pay off over the medium to long term.

We would expect to see evidence of long term value for money and returns being used in budget decisions i.e. not cutting spending where it will lead to increased costs in longer term. For example, the cutting of many low carbon energy incentives by the UK government last year has been heavily criticised, as they appeared to be short-term cost-cutting measures that will result in much higher costs to achieve the necessary transition to a low carbon economy in the longer term, particularly as they undermined investor confidence, which could have a persistent effect of dampening investment and mean additional (costly) incentives will be required to catalyse private sector investment in future.

Giving enhanced priority to the longer term needs should also lead to clear statements of long term and increased investment in services which increase ecological and therefore

economic resilience for Wales, as required in the Environment Act—e.g. in soils, biodiversity, water quality and marine and fisheries management

- Taking an integrated, collaborative cross-governmental approach.

WWF has long argued that breaking down departmental silos is crucial for tackling complex, long-term issues at the lowest cost. There's a need to make more use of pooled funding approaches which enable greater cross-departmental collaboration to permit spending by one department that reduces costs for another. Setting aside a specific tranche of budget that is available only for these kinds of proposals would be one way to achieve this.

In order to ensure that departments consider their impacts across the goals, we would like to see an action plan developed for each goal that considers how the actions of all relevant government departments can contribute, and which therefore allocates responsibilities between departments so as to achieve the goal in the most cost-effective way possible, and allocates budget accordingly.

However, for this initial budget, we would expect evidence of change in prioritisation of budget spend, as well as some pooling. For example, will the health budget recognise value of spending on urban trees or energy efficiency to improve health and reduce longer term costs?

We might also expect to see funding to increase collaboration and research between economic and environmental sectors including agriculture and coastal and marine management

- Deploying resources to prevent problems – tackling their root causes

We have supplied further detail on this in Question 4. However, it would be a good step to see some acknowledgement of the need to investigate where WG funding actually creates problems which the public purse subsequently has to resolve e.g. agricultural subsidies which may encourage the pollution of rivers, which NRW then must pay to clear up, or regional economic subsidy which creates waste which needs managing. This is about having an eye on the 'whole system' budget and whole life cost of budgetary decisions.

D. Evidence that protection of natural resources for future generations is being given more priority

WWF Cymru is concerned that this core underpinning objective of the SD principle is properly addressed. Recent evidence on the state of the Welsh environment shows the continued loss of biodiversity within Wales. The need to address this loss and take action on the causes of such loss to ensure future benefits *must* be given higher priority if the Wellbeing duty 'to carry out sustainable development' is to be achieved.

Therefore, we feel that this budget must start to demonstrate an increased investment across government departments in action that will maximise their contribution to the Resilient Wales goal.

WWF's forthcoming Living Planet Report (published 27th October) will highlight the global decline of nature and the impact this has on its services to humanity and species. We rely on these global resources for our wellbeing in Wales and therefore need to take account of the limitations when developing our policies. This issue is represented in Goals 1 and 7 of the WFGA and we therefore expect the PfG and budget to take these into account.

WWF Cymru thinks there are 3 key areas for action which would help transform the way the Welsh public sector protects our natural resources. These are :

- Drive investment in our natural resources
- Incorporate information on natural capital into the annual Budget reporting.
- Develop new tools and approaches for assessing the economic risks associated with natural capital depletion.
- **Drive investment in maintaining and restoring natural capital assets (i.e. our natural resources) .**

We believe that targeted public investment in natural capital, would provide significant benefits to the economy, businesses and communities. The Budget therefore also needs to mobilise private finance at a greater scale, to minimise the burden on the public purse.

Therefore we would expect WG to consider and start to increase its level of investment in natural capital (Sustainable management of natural resources) – and not just through NRW's budget. As stated previously, we would expect to see investment in this green infrastructure included within the budget for national infrastructure.

We believe the Government should develop a natural capital investment strategy that explores potential financing mechanisms for investment in our natural capital (or resources), from either redirected public sources or private sources leveraged through appropriate fiscal or regulatory policy measures. This could include mechanisms such as use of newly devolved taxes, compensation schemes or biodiversity offsetting, or the use of innovative financing mechanisms such as Environmental Impact Bonds, through which finance can be generated for investment in natural capital in the expectation of future public sector savings e.g. from healthcare costs etc. This can represent a cost-effective way to manage the costs of natural capital depletion and raise upfront finance for investment in natural capital.

- **Incorporate information on natural capital into the annual Budget reporting.**

WWF believe that WG must recognise the contribution of natural capital to the Welsh economy and its dependence on both domestic and international natural capital. It is important that the trends in the overall asset base and the extent to which they are affecting service/benefit provision are considered when making budget allocations

We would expect WG to summarise how natural capital information was used to inform development of the Budget. Indeed they should also assess the impacts of the Budget (i.e. the policies and budgetary allocations it contains) on Wales's natural capital and any associated benefits and risks.

If this is not provided then WG should commit to incorporating natural capital information in future budgets, and develop principles setting out how it will be used to inform budgetary decision-making. Indeed, any reports issued from Government in regard to 'state of the economy' based on Gross Domestic Product (GDP) or GVA should be accompanied by information on, for example, the status of natural capital stocks, as well as associated risks, liabilities and maintenance investment requirements. This would give a more rounded picture of progress towards the Prosperous Wales and Resilient Wales goals.

The basis of this information may be provided, in part, by NRW's State of Natural resources report due out in September 2016. However, this will take no account of the resilience of the international resources we rely upon. The resilience of supply chains for Welsh businesses and consumers must become a key consideration. This is essential for the wellbeing of future generations but also to fulfil our 'Globally responsible Wales goal.

- **Develop new tools and approaches for assessing the economic risks associated with natural capital depletion.**

In order to assess whether natural resources are being protected for future generations, WWF Cymru believes WG must develop new tools and approaches for assessing the economic risks associated with natural capital depletion. For example, WWF has proposed conducting natural capital stress tests which look at the economic impact (on different sectors of the economy) of future scenarios relating to natural capital depletion trends, thus better assessing the risks and informing policy to manage those risks.

4. The Committee would like to focus on a number of specific areas in the scrutiny of the budget, do you have any specific comments on the areas identified below?

- Approach to preventative spending and how is this represented in resource allocation (Preventative spending = spending which focuses on preventing problems and eases future demand on services by intervening early)

Preventative spend has not yet been applied effectively in regards to Wales stock of natural capital i.e. its natural resources. As Dieter Helm (chair of England's Natural Capital Committee (NCC)) states, sustainability requires maintaining our stock of natural capital for future generations. The Resilient Wales goal, taken alongside Goal 1's environmental limits, clearly recognises this issue and its importance. Indeed the Environment Act clearly lays this out as an objective for Welsh Government and NRW.

Applying this principle, would ensure more priority for the protection and restoration of Wales biodiversity. We therefore need to see natural capital included in preventative spending. This is recognised by New Economic Foundations work on prevention

http://b.3cdn.net/nefoundation/b8278023a5b025649f_5zm6i2btg.pdf

A common perception is that protecting the environment is too costly. However, there is growing evidence that allowing nature's capital to be lost will be much more expensive in the long run. The NCC warned UK Government that many of the services provided by our natural capital are at high or very high risk. This is already imposing significant costs to UK taxpayers, businesses and landowners .

EXAMPLES OF THE ECONOMIC IMPLICATIONS OF NATURE'S DECLINE

Flooding: it is widely accepted that poor land-use practices in river catchments are a major contributing factor to flooding, and that we need to work more with natural processes than we have in the past (such as by improving soil condition to enhance water infiltration, restoring upstream wetlands to store flood water at source, and planting of trees and re-naturalising water courses to slow water conveyance). The role that the UK's coastal wetlands play in mitigating flooding and storm damage has been valued at £1.5bn per year. Investing in natural capital solutions can be more cost effective in reducing flooding than building man-made structures, as well as producing a wide range of other economic benefits. The potential cost of the winter 2015/16 floods has been estimated to be at least £5bn; costs that will be borne by the UK's insurance sector, businesses, individuals, communities and government. Extreme weather events are also predicted to become more frequent under climate change scenarios, exacerbating future flood risks.

Soil degradation: the total annual costs of soil degradation in England and Wales (through loss of organic matter, compaction, and wind and water erosion) have been estimated at £1.2bn a year, including the costs of reduced productivity and carbon emissions from degraded soils.

Overfishing: overharvesting of many wild fish stocks has dramatically reduced yields, leading to lower economic returns to coastal communities. The NCC estimated that the UK fishing industry could generate an additional £1.4bn in annual revenues if UK fish stocks were recovered to the average levels seen before the 1970s.

Air quality: some 50,000 people a year are dying prematurely in the UK because of air pollution. The annual health, environmental and CO2 costs of air pollution from UK industry alone have been estimated at £9.5-£15.5bn. Here in Wales there have already been some trials of payments for ecosystem services, for example by Dwr Cymru and NRW, in improving water quality by investing in improving land management in river catchments. There is considerable opportunity to develop this approach further in redesigning payment systems post CAP.

Air pollution must be tackled by much more integration of infrastructure spending, particularly with environmental and health benefits. Such improvements will prevent future high costs to the health service. Similarly with our earlier example on energy efficiency measures which can produce warmer homes and improve health outcomes.

Over recent years, there has been a considerable under investment in marine capacity within Wales. The Wales marine plan is now considerably overdue. These plans were intended to provide integrated and sustainable approaches to protecting and utilising our seas. The delay will not provide the certainty that investors, such as in marine renewables, require.

This lack of capacity in marine planning makes preventative spending more difficult. Furthermore, for the environment a precautionary approach – not just a preventative one is required. There is often reluctance when making development and investment decisions to recognise the need to take this approach to avoiding serious harm. There was much discussion on this in the development of the Environment Act and government felt it was not necessary to reiterate this principle. Given that it was already required under environmental legislation. While the latter is true, it is rarely accepted as a form of cost saving. I.e. it is intended to prevent future harm to the environment which might have unforeseen consequences for ecosystem services and is also likely to be very costly to correct.

Finance can be raised through a preventative approach as well. An **Environmental Impact Bond (EIB)** is a financial vehicle that monetises the future savings that will be generated from a particular natural capital investment, by allowing the managers of that natural capital to borrow the money upfront in order to undertake the required investment, and to repay the money later when the savings have been realised. This is a fairly new and innovative concept, and one which is modelled on Social Impact Bonds (SIBs), which are structured in a similar way, but involve investments in socially beneficial outcomes.

This kind of approach is being developed in the USA, through a project which it is hoped will enable the US Forest Service to ‘borrow’ from their own future wildfire fighting funds in order to pay for current wildfire prevention, thus reducing future costs by more than the amount borrowed, which means they will be able to pay back the loan and have some money left over, creating a virtuous cycle in wildfire-prevention financing¹.

- Sustainability of public services, innovation and service transformation

Much of the £15 Billion public expenditure in Wales is spent through other parts of the public sector, including local government, (who deliver services on behalf of their communities), regional health bodies and bodies with a ‘whole Wales’ remit. WG influences policy, governance and performance frameworks for these bodies. This means that WG have a clear role in creating the conditions for others to respond to the WFGA. This is a major opportunity to drive the WFGA framework across public service through the budgeting process ensuring innovation and service transformation. The budget should be giving **clear signals that from now on this will be the case.**

WG should also be looking at what budgeting or financial requirements are posing barriers to delivery of the WFGA and committing to work with public bodies to remove these. These may include short term budget allocations, and cost benefit analysis processes which overly discount future benefits and so prevent ‘spend to save’ approaches.

- Preparation for the UK to leave the EU

There is a clear opportunity afforded by the replacement of European funding to design public spending in Wales to better deliver the goals of the WFGA. This, and the Environment

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Act, should be the clear frame for the plans to replace EC funding in Wales. In particular, the budget should resource work on the replacement of the Common agricultural policy with a more integrated system which reduces the harmful impacts of agriculture and encourages the sustainable management of natural resources and resilient ecosystems (as required by the Environment Act. As has been proposed in earlier sections, there are many budgetary approaches that should be being developed in the next two years to enable this transition.

- Low carbon budgeting and preparing for the Future Generations Act

WWF Cymru's framing of all our responses is aimed at the effective implementation of the WFGA and Environment Acts. Please therefore refer to all of our response for expectations under the WFGA. Low carbon budgeting is one important aspect of this which we discuss further in this section.

This is the first time a budget has to be developed subject to the new duties in the WFGA so it is extremely important that it clearly shows a change in approach is in motion and WG recognises the challenges and opportunities this provides. Tackling climate change is a key aspect to sustainable development and is identified within three goals of WFGA (1, 2 and 7). The budget should therefore clearly identify how it is addressing this issue.

As explained in answers above there are a number of policies and approaches we expect to see as part of a sustainable budget which would tackle climate change – both emission reduction and also preparing for the adaptation required for climate change e.g. Energy efficiency is a key policy for reducing emissions; green infrastructure can support adaptation to climate change in numerous ways.

Another way to assess the impact of budget on emission reduction is via a 'carbon impact assessment.' This tool has been used in a number of countries including Scotland which has a legal requirement for this process through their Climate Act². This makes carbon a variable that needs to be considered and without this it is unlikely it would.

A carbon impact assessment is a similar approach to the use of the Equality Impact Assessment referenced in the letter from Cabinet Secretary to the Chair p.7³. Our understanding is this impact assessment is based on equalities evidence only because it's a requirement under the Public Sector Equalities Duties. A similar impact assessment for carbon would demonstrate WG's commitment to tackle climate change and give it a similar status to equalities issues.

Stop Climate Chaos Cymru recommended this was a legal requirement within the Environment Act. This amendment to the Act was not passed by the WG so we recommend that the Committee highlights this as an expectation on WG as part of the WFGA.

The Scottish carbon impact assessment method is not directly transferable as we have a different legal framework and carbon budgeting system (e.g. they have yearly targets we have

² Carbon Assessment of budget <http://www.gov.scot/Resource/0049/00491254.pdf>

³ [FIN\(5\)-05-16 PTN2 Letter from the Presiding Officer to the Chair – 16 September 2016, item 3.2](#)  PDF 378 KB

5 year budgets). We also do not have the data available in Wales to undertake the same assessment due to no economic Input / Output tables for Wales. This lack of Input / Output data is a considerable issue for assessments in a number of areas and should be highlighted by the Committee and something that urgently needs to be addressed by WG.

WWF Cymru also recommends that lifecycle assessment is used for major infrastructure projects. Lifecycle assessment is more in line with the SD principle of the WFGA especially long term and preventative approach.

We therefore recommend the Committee suggests that, under the WFGA, WG should specifically identify the carbon impact of the budget –i.e. its contribution to emissions in Wales and globally. It is unlikely WG intend to provide this as it was not something it wanted to incorporate into the Environment Act. At the very least for this 1st budget WG should provide an outline of the carbon contribution of the budget (e.g. total emissions contributed by the draft budget and key areas which generate these emissions across the portfolios) with expectations it develops an effective comprehensive methodology for the next budget. This maybe something that links into the natural capital assessments we have recommended. The most effect method for Wales will need to be developed with stakeholders.

- Impact of the Welsh Government’s legislative programme and whether its implementation is sufficiently resourced

See earlier comments on Env Act and WFGA

- Scrutiny of Welsh language, equalities and sustainability

We have commented on achieving sustainability through the delivery of the changes required by the WFGA throughout our response.

5. The previous Welsh Government have highlighted that the Draft budget 2017-18 will be aligned with national indicators for Wales.

WWF Cymru is unsure why this might be being proposed. As Welsh Government have stated repeatedly, the National indicators are population level indicators of progress and Welsh government alone cannot hope to improve them.

Following previous rationale, we would expect that Welsh government sets its own objectives to meet the Goals(Programme for government) and then sets performance measures for those. Then we would expect the budget to be set to achieve this. There may therefore be some disunity between these two approaches. The indicator approach might also mitigate against a cross departmental and integrated approach.

However, our biggest concern is that the outcome of such an approach will be an indicator-led public sector, developing a whole industry of reporting and compliance around resource use. WWF Cymru believes it would be far better to align the budget around the goals and demonstrate how the SD principle is being applied to allocation and financial reporting

It should also be obvious that there will be outcomes from WG funding that aren't covered by the indicators. The indicators are limited set and do not represent everything budget expenditure wishes to achieve.

- What, if any, additional national and local indicators would you like to see as a means of supporting the shift towards a greater focus on preventative spending?

To properly assess the resilience of ecosystems in Wales will require a suite of indicators and will have to look at the quality of different habitats. The current national indicator only includes terrestrial habitats. Therefore if budget were focussed on this there is a danger that work on the marine environment would lose out. Although we support the initial indicators of species and habitat health, focussing spending and assessing its impact will require more detailed evidence.

Indicators or other measures which capture rate of return on upfront preventative spending (in terms of future outcomes and expenditure requirements) would be important to make a credible case to scale up preventative spending, and facilitate access to Environmental impact bonds.

8. Do you feel that allocations made by the Welsh Government are sufficiently evidence based?

No, unless previous methodology has been changed it is unlikely that sufficient assessment will have been made of the impact of alternative investments. For England, the Natural Capital Committee,(NCC) propose the assessment of alternative investments to see which would yield the biggest social, environmental and economic gains. In assessing the most cost effective budget allocations, to deliver on the WFGA, one would also expect the negative consequences and consequential costs to other departments or public bodies to have been assessed before budgets are finalised.

The NCC also propose the construction of an asset risk register, which will capture the state of ecosystem health and resilience, highlight those types of natural capital at greatest risk of depletion and their associated negative economic and social impacts. This would help inform the prioritisation of investment in natural capital assets.

We would also recommend the development of a register of environmentally harmful subsidies, for which internationally recognised methodologies exist.

Another tool to help improve the evidence base and transparency of the budget process would be to set up an advisory group for the embedding WFGA into budget setting. This would be in a similar form to the Budget Advisory Group for Equality (BAGE).

9. What changes to allocations and priorities do you feel need to be reflected in the draft budget 2017-18 and subsequent years as a result of the vote to leave the EU?

In Marine terms, much of the data collection to assess health of seas is European driven and funded. Hm Treasury has guaranteed the maintenance of scientific funding (which provides

for much of the academic research essential to this field) until 2020, but WG must bear in mind the need for this in future.

WWF, like many other organisations has used EC funding to develop knowledge and good practice in management. Our own EC funded Celtic Seas Partnership is soon ending. It has engaged Stakeholders in planning the future of Celtic Seas. Welsh Government engagement on marine has been unsatisfactory. The likely loss of some of the European site officers will not help meet the need for staff capacity and funding to deliver a sustainable future for our seas.

10. What long term planning is carried out to fully deliver on preventative spending strategies and how do you plan for this within short term budget periods?

WG need to develop a long term impact assessment framework and multi-year planning periods to make this effective.

11. What baseline evidence is used to measure preventative outcomes?

There is some baseline data provided on the Welsh environment through SoNaRR and some marine monitoring. However, some future trends assessments are necessary alongside this and some analysis of most cost effective mitigation and restoration measures. This is better provided for in regard to GHG emission data, which is calculated annually to a 1990 baseline and there have been numerous studies on the future trends from different scenarios. The Committee on Climate Change continues this work for the UK. UK Government undertook some analysis of the most cost effective mitigation measures against these trends. This approach needs replicated to measure preventative outcomes.

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